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JAN 11 2002

THE **DIAL** CORPORATION

CERTIFIED, RETURN RECEIPT REQUESTED

Executive Offices

15501 North Dial Boulevard
Scottsdale, AZ 85260-1619

Tel: 480 754 3425
Fax: 480 754 1098

January 7, 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 1913-2029

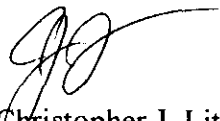
RE: Lower Darby Creek Superfund Site, Philadelphia, PA
104(e) Reply by The Dial Corporation

Dear Ms. Prisk:

This acknowledges receipt by The Dial Corporation of a December 20, 2001 letter from Mr. Larry S. Miller of your agency requesting information from us.

This letter timely replies to your request for information. Enclosed is our two-page response to all the questions. We are asserting no claim of confidentiality for the information we have provided here.

Sincerely,



Christopher J. Littlefield
Senior Vice President & General Counsel

Enclosure

**RESPONSE BY
THE DIAL CORPORATION
TO 104(e) QUESTIONS BY EPA
LOWER DARBY CREEK AREA SUPERFUND SITE
PHILADELPHIA, PA**

Responses below correspond to the same numbered questions in Enclosure F of the federal EPA 104(e) letter of 12-20-01 sent to The Dial Corporation

1. The Dial Corporation (Dial) was incorporated August 15, 1996 in Delaware, same for b. and no parent for c.
2. Dial currently has no business in the Philadelphia area. In 1985 Dial acquired the stock of Purex Corporation, which then operated a *detergent manufacturing* facility in Bristol, PA, near Philadelphia. Dial subsequently closed that plant in 2000. Prior to 1985 Purex Corporation's Bristol, PA facility allegedly operated as a soap manufacturing plant but details are currently unavailable concerning pre-1985 operations of Purex Corporation at Bristol.
3. The most knowledgeable current employee in Dial that has the most knowledge about the Bristol operations is Mr. Jay Sampat, who is currently in out of the country on vacation until mid January 2002, and unavailable within the response time required for this reply. Mr. Sampat worked at the former Dial facility in Bristol until it closed and is currently the corporate safety and environmental manager for Dial. After Mr. Sampat returns to work, he will be asked to provide any further information to supplement this reply. Dial is unaware of any former employees who would have any information more helpful than that from Mr. Sampat. Mr. Sampat can be reached at: The Dial Corporation, 125 Jaycee Drive, West Hazleton, PA 18201, phone 570-455-9980, ext. 250.
4. The only operation Dial has any responsibility for, in the general Philadelphia area, is the above-mentioned Bristol facility. See answer 2, above. Dial currently has no information or documents concerning the wastes and their disposal from the former Bristol facility other than the most current years of operation, all post-1995. None of those records show any disposal to the Lower Darby Creek Superfund Site landfills.
5. None. Not applicable for b. c and d.
6. Unknown.
7. Unknown.
8. Unknown.
9. Unknown.
10. Unknown.
11. Unknown.
12. Unknown.
13. Unknown.
14. Unknown.
15. In the absence of Mr. Sampat, this response has been prepared by: Kenneth M. Ries, environmental consultant to Dial, 8707 E. Valley View Road, Scottsdale, AZ 85250, phone 480-946-0770. All future correspondence on this matter

should be directed to: Christopher J. Littlefield, Senior Vice President and General Counsel, The Dial Corporation, 15501 N. Dial Boulevard, Scottsdale, AZ 85260-1619, phone 480-754-5267.

16. Most of the information solicited by EPA is unavailable. Dial's record retention policy generally requires that unless records are specifically needed for either business reasons or for compliance reasons, they are routinely destroyed. Dial currently has no records or information for the relevant period 1958-1976 for its former Bristol operations, a period long before Dial acquired Purex Corporation including the Bristol facility in 1985. When the Bristol facility was closed in 2000 plant records were destroyed in accordance with Dial's normal record retention practices.